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Attorney Barragay

Mr. Michael Powell,

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GMPC5 Spectrum

Dear Mr. Powell,

I am delighted to see that you will be coming to the ITU's Global Symposium for Regulators in December. I know how busy you must be, and I understand the difficulties of international air travel at this difficult time, so I very much appreciate the effort you are taking.

The purpose of this letter is to raise a number of issues related to the recently released FCC Notice of Proposed Rule-Making as it relates to the use of the 2 GHz spectrum band by Global Mobils Personal Communications by Satellite (GMPCS) operators. Although the TTU does not, as a rule, respond to national regulatory inquiries, carried out by our Member States. an this particular issue, I have received a considerable volume of correspondence from TTU Members, notably GMPCS operators and from regional telecommunications associations such as the Paolific Islands Telecommunications Association (PITA) and the African Telecommunications Union (ATU), amongst others.

As you will know, the ITU played an instrumental role in the development of the GMPCS industry, through the allocation of spectrum at successive World Radio Conferences, through the World Telecom Policy Forum held in March 1998, and through ITU's stewardship of the GMPCS-Mou. ITU shares the vision of the GMPCS industry of the potential that this technology holds for extending the benefits of telecommunications technology to all the world's Inhabitants, Induding those living In remote and rural locations. The recent spectrum assignments in the 2 GHZ band promise also to bring broadband services to rural areas, helping to avaid the emergence of new dimensions of the , digital divide.

Experiences with the first generation of narrowband GMPCS technology have illustrated the critical importance of integrating both satellite and terrestriel infrastructures in order to ba able to deliver services effectively. It is also important to retain the maximum amount of flexibility in deploying services to meet evolving needs.

Having regard to the various representations I have received. I am convinced of the importance for the GMPCS operators to be able to use the spectrum allocated for both satellite and terrestrial Purposes. In particular, the use of ground-based repeaters (sometimes called an ancillary terrestrial component, or ATC) will enable services to be provided to a much wider area, including providing indoor coverage. I believe this application is consistent with the Raaio Regulations and,

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indeed, It is specifically called for in Resolution 716 (Rev. WRC-2000) which encourages administrations to take such steps and for the ITU to pany out technical studies to provide administrations with the necessary tools for interference assessment and replanning of terrestrial networks in the 2 GHz band, This work is underway and will be reported at WRC-OS.

In conclusion, I think there is an apportunity here to enhance greatly the usefulness of the spectrum being allocated for use by GMPCS operators by allowing a closer integration of satellite and terrestrial infrastructures. I hope that you will regard favourably the applications you have received in granting this flexibility.

Yours sincerely,

Yoshio UTSUMI, Secretary-General

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